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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: 5HW

SEP 2 0 1383

Larry Eastep, Manager
Permit Section, DLPC
Illinois Environmental Protection
Agency
2200 Churchill Road
Springfield, Illinois 62706

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1983

D.L.P.C. LINOIS

Re: Part B Application Technical Review Motor Oils Refining Co.
ILD 000646786

Dear Mr. Eastep:

We are herewith transferring a copy of the subsequent submission (received September 7, 1983) from the above referenced facility for processing according to the FY'83 Cooperative Agreement. Please provide the following to the Region V office within 60 days:

- 1. A written recommendation to issue or deny a permit based on your technical evaluation.
- 2. A written draft permit based on your specific recommendations.

Your cooperation in expediting this process is appreciated. Please contact Mrs. Editha M. Ardiente of my staff, at (312) 886-7457, with any questions.

Sincerely.

William H. Miner, Chief

Technical, Permits, and Compliance Section

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EPA Region 5 Records Ctr.

Enclosures

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Notor Cils Refining Company



Mr. William H. Miner, Chief Technical, Permits and Compliance Section U. S. Environmental Protection Agency, Region V 230 South Dearborn Street Chicago, IL 60604

WASTE MANAGEMENT BRANCH

Dear Mr. Miner:

Motor Oils Refining Company has addressed the deficiencies to its Part B Application stated in your notice dated 27 July 1983. As a result we are submitting revisions to sections of the original application, in quadruplicate.

One item, a topographic map of the plant site, has not been completed by our contracted engineering firm. As soon as it is completed it will be forwarded to you as a page to insert in the application.

Attached you will find a brief summary of the revisions made to our application and four sets of revisions complete with instructions for posting.

We believe that our revised Part B Application adequately addresses the items contained in your notice. We remain ready to address any further questions you may have regarding the application.

> John P. O'Connell President

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SEP 28 1983

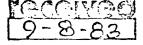
EPA - DLPC STATE OF ILLINOIS

7601 West 47th Street McCook, Illinois 60525



WASTE MANAGEMENT

BRANCH



SUMMARY OF DEFICIENCY CORRECTIONS

The following is a synopsis of corrections made as indicated in your Notice of Deficiencies, Attachment A. We have attempted to identify the type of correction and indicate where the correction will be found in revised or inserted pages in the Part B Application.

1. Facility Description (B-1, 3)

The incinerator is not a hazardous waste incinerator. It operates similar to a flare in that it burns the plant's cracked waste gases, which are byproducts of the main operations. It does have a state operating permit. This is addressed on the revised page 15.

2. Topographic Maps (B-2)

A Plot Plan detailing buildings, sewers, fire control facilities, drainage barriers and run off control systems is included on inserted page 15.20. The topographic map of the plant site is not complete. It will be forwarded to you in September and it will be inserted page 16.10.

3. Floodplain Standard

The complete map, including documentation that it is a 100 year floodmap, is on inserted page 18.10. Also the levee that is of concern to the plant is indicated on the floodmap.

4. Waste Analysis Plan (C-2a, 2d)

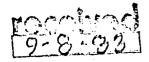
This is addressed on revised page 26. The term "infrequently" has been changed to annually.

5. Traffic Information (B-4)

The volume of traffic, the road's load-bearing capacity, the access road surfacing have all been added to revised page 19.

6. Containers (D-1)

The procedure for unloading oil in containers is described in more detail. Also, included on revised page 30 and 31 is a detailed description of the 60'x15' concrete slab where the drums are emptied and consequently stored. This slab has a curb to prevent both run—on and run off with run off accumulated in the collection sump.





7. Tank Description (D-2)

The storage tanks are atmospheric pressure and there are no pressure controls on the tank (other than the vent). This is addressed on revised page 33. Information on corrosion and the details of the feed system are addressed on inserted page 33.10.

8. Security procedures and Equipment (F-1)

The traffic control procedures for arrivals and departures, and security procedures that plant employees follow are addressed on revised page 39.

9. General Inspection Schedule (F-2a)

The safety, emergency and process equipment inspectors, plus the list of process equipment is added on revised page 40. Inserted page 40.10 describes the items to be inspected on each item of safety and emergency equipment.

10. Tank Inspection (F-2B)

There are no pressure and temperature gauges on the storage tanks. Overfilling is prevented by Shift Supervisor and the Operator checking first for adequate volume before unloading. This is addressed on revised page 43 along with procedures for tank interior inspection.

11. Preparedness and Prevention Requirements (F-3)

The applicant does not wish to request a waiver of the preparedness and prevention requirements. This is stated on inserted page 44.10.

12. Preventive Procedures, Structures, and Equipment (F-4)

The procedures followed for accidental spills along with a more detailed description of the improvised dike area is addressed on revised page 45 F-4a. Also included on that page are areas where the plant is paved (F-4c) and a statement that the plant's protection equipment meets OSHA requirements (F-4e).

13. Contingency Plan (G-1)

The dikes, sump pumps, drainage system and other spill control devices are high-lighted on the Plot Plan drawing (page 15.10). Copies of the emergency reports will be located in the plant operations office as stated on revised page 52.

14. Closure Plans, Post-Closure Plans and Financial Requirements

A more detailed closure plan is addressed on revised page 79. A Financial Report is included on inserted page 81.01 thru 81.15.

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MOTOR OILS REFINING COMPANY

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Instructions for posting changes to Part B Application.

SECTION B

- 1. Facility Description
 - a. Remove page 15, Revision 0, dated 25 May 83. Replace with page 15, Revision 1, dated 23 Aug 83
 - b. Insert pages 15.10 and 15.20, Revision 0, dated 23 Aug 83 between pages 15 and 16.
 - c. Insert page 15.30, Revision 0, dated 2 Sep 83 between pages 15.20 and 16.
- 2. Flood plain Standard, Section B

Insert page 18.10, Revision 0, dated 23 Aug 83 between pages 18 and 19.

3. Traffic Information

Remove page 19, Revision 0, dated 25 May 83; replace with page 19, Revision 1, dated 23 Aug 83.

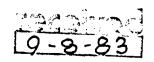
SECTION C

4. Waste Analysis Plan

Remove page 26, Revision 1, dated 31 May 83; replace with page 26, Revision 2, dated 23 Aug 83.

SECTION D

- 5. Containers
 - a. Remove page 30, Revision 1, dated 31 May 83; replace with page 30, Revision 2, dated 23 Aug 83.
 - b. Remove page 31, Revision 0, dated 25 May 83; replace with page 31, Revision 1, dated 23 Aug 83.
 - c. Remove page 32, Revision 0, dated 25 May 83; replace with page 32, Revision 1, dated 23 Aug 83.





SECTION F

6. Tanks

- a. Remove page 33, Revision 0, dated 25 May 83; replace with page 33, Revision 1, dated 23 Aug 83.
- b. Insert page 33.10, Revision 1, dated 23 Aug 83 between pages 33 and 34.
- c. Remove page 36, Revision 0, dated 25 May 83; replace with page 36, Revision 1, dated 23 Aug 83.

7. Security Procedures and Equipment

- a. Remove page 39, Revision 0, dated 25 May 83; replace with page 39, Revision 1 dated 23 Aug 83.
- b. Remove page 40, Revision 0, dated 25 May 83; replace with page 40, Revision 1, dated 23 Aug 83.
- c. Insert page 40.10, Revision 0, dated 23 Aug 83 between pages 40 and 41.
- d. Remove page 43, Revision 0, dated 25 May 83; replace with page 43, Revision 1, dated 23 Aug 83.
- e. Insert page 44.10, Revision 1, dated 23 Aug 83, between pages 44 and 45.
- f. Remove page 45, Revision 0, dated 25 May 83; replace with page 45, Revision 1, dated 23 Aug 83.

SECTION G

8. Contingency Plan

Remove page 52, Revision 0, dated 25 May 83; replace with page 52, Revision 1, dated 23 Aug 83.

SECTION_I

9. Closure Plans

Remove page 79, Revision 0, dated 25 May 83; replace with page 79, Revision 1, dated 23 Aug 83.

Insert pages 81.01, 81.02, 81.03, 81.04, 81.05, 81.06, 81.07, 81.08, 81.09, 81.10, 81.11, 81.12, 81.13, 81.14, and 81.15, Revision 0, dated 23 Aug 83 between pages 81 and 82.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-12

MIN 1 0 1986

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Lawrence Eastep, Manager Permits Section, DLPC Illinois EPA 2200 Churchill Road Springfield, Illinois 62706

> Re: Part B Permit application Motor Oils Refining Company

ILD 000646786

Dear Mr. Eastep:

I am transferring additional information for the above referenced Part B application. Please contact Mr. David Dolan, at (312) 886-0994, if you have questions regarding this matter.

Sincerely,

William H. Miner, Chief

Technical, Permits, and Compliance Section

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Enclosure: Copy 3, Dated 12/30/83

cc: Ken Bechely

William Radlinski, IEPA

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JAN 17 1984

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Motor Oils Refining Company

December 30, 1983

Mr. William H. Miner, Chief
Technical, Permits and Compliance Section,
U.S. Environmental Protection Agency, Region V Agency
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Miner:

This letter is in response to your request for additional information for our facility's Part B Permit application (ILD 000646786). In that December 5, 1983 letter you had several questions regarding our Waste Analysis Plan, Process Information, and Closure Plans. This response will refer to the same numbering scheme that appears in your letter.

- 1a. The lab report on page 24 is a total analysis for metals on the oil (liquid) portion of the used oil.
- 1b. The maximum percentage of water is addressed on revised page 25.
- 1c. This is addressed on revised page 26.
- 2a. This is addressed on revised page 30.
- 2b. This is addressed on revised page 33:10. JAN 17 1994
- 2c. This is addressed on revised page 33.10. E.P.A. D.L.P.C. STATE OF ILLINOIS
- 2d. The cross section of Unloading Section 1 are attached (see newly inserted pages 37.10 and 37.20). The trucks sit on gravel. The ground does not slope to the collection sump. However, the Station #1 is diked.
- 2e. Both No. 1 and No. 2 Unloading Station can go to Tank 100.
- 2f. Used automotive and industrial oils as well as used diesel engine oils are unloaded at No. 2 Unloading Station.

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- 2g. The area around Tank 100 and 101 is not diked. However, the entire plant is diked.
- 2h. Diesel engine oils are unloaded at No. 1 and No. 2 Stations. The diesel tanks are located east of Tank 101 (see Plot Plan)
- 3a. This is addressed on revised pages 79 and 80.

We hope this information is sufficient. As in the past, we remain ready to address any further questions you may have regarding the application.

Yours truly,

John P. O'Connell

President

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